

**IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF FLORIDA
MIAMI DIVISION**

Case No. 25-CV-22652-KMW

ALEJANDRO MOSQUEDA PAZ
p/k/a “ALMIGHTY,”

Plaintiff,

v.

PRIMO BOYZ RECORDS LLC a/k/a
PRIMO BOYZ RE L.L.C, PRIMO BOYZ
MUSIC PUBLISHING L.L.C., and JOSÉ
POLANCO,

Defendants.

_____/

JOINT NOTICE IDENTIFYING PENDING ISSUES

Plaintiff, Alejandro Mosqueda Paz a/k/a “Almighty” (hereinafter referred to as “Plaintiff”), and Defendants, Primo Boyz Records LLC a/k/a Primo Boyz RE L.L.C, Primo Boyz Music Publishing L.L.C., and José Polanco (hereinafter referred to as “Defendants”)(collectively “Parties”) hereby file this joint notice identifying pending issues as required by ECF No. 31:

1. On October 16, 2025, Plaintiff filed its Motion to Strike certain affirmative Defenses filed by Defendants (ECF No. 27)(“Motion to Strike”).

2. On October 22, 2025, the Court, *sua sponte*, issued an order requiring the Parties to identify which issues raised in the Motion to Strike and whether the Motion to Strike is considered moot in whole or in part.

3. The Parties wish to inform the Court that the following Affirmative Defenses will be withdrawn by Defendants and are therefore deemed resolved: Affirmative Defenses Nos. 1, 4, 8, and 11 (partially as to last paragraph of Affirmative Defense No 11). Defendants have agreed to amend and better plead Affirmative Defense No. 16.

4. The Affirmative Defenses that remain in dispute are Nos. 5, 7, 9, 17, 18.

5. Consequently, the Motion to Strike is moot as to the defenses identified herein.

6. In an abundance of caution and for the sake of clarity, the Plaintiff is filing its Amended Motion to Strike to reflect the above.

CERTIFICATION OF COMPLIANCE WITH LOCAL RULE 7.1(a)(3)

The undersigned counsel hereby certifies that, in compliance with Rule 7.1(a)(3), Federal Rules of Civil Procedure, that undersigned counsel has conferred with counsel for Defendants regarding the contents of this response and this response is therefore being filed jointly.

Dated: October 24, 2025

Respectfully submitted,

By: /s/ Humberto Rubio
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Attorneys for Defendants

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on this 24th day of October, 2025, I caused to be served a true and correct copy of the foregoing using CM/ECF, which served a true and correct copy to all counsel or parties of record.

By: /s/ Humberto Rubio
Humberto Rubio, Jr., Esq.